

EXHIBIT 4

Page 1

1 UNITED STATES DISTRICT COURT

2 EASTERN DISTRICT OF CALIFORNIA

3

4 MATTHEW PETERSON, SADIE FLODING,)
COLIN STRUB, CARSON BRENDA, JODY)
5 BARRY, TEISCHA BENSON, LYNNETTA)
KLAM, and LORI DAVIES,)

Plaintiffs,

CERTIFIED
TRANSCRIPT

9 THOMSON INTERNATIONAL,)
9 INCORPORATED, a California)
9 corporation; DOES 1-10,)
10 inclusive; and ROE ENTITIES 1-10,)
10 inclusive,)
11)

Defendants.

12 _____)

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16 REMOTE DEPOSITION OF LORI DAVIES

17 Pages 1 - 124

18 Thursday, January 11, 2024

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23 Stenographically and Remotely Reported By:
Sarah Goekler, RMR, CRR, CCRR
24 CA CSR No. 13446

25 File No. 97833

1 Thursday, January 11, 2024 10:00 a.m.

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3 LORI DAVIES,

4 having first been remotely sworn by a Certified
5 Shorthand Reporter for the State of California, was
6 examined and testified as follows:

7 EXAMINATION

8 BY MS. CHEN:

9 Q. Ms. Davies, my name is Helen Chen. I
10 represent defendant Thomson International, Inc.
11 Could you please state your full name for the
12 record?

13 A. Yes. Lori Passadore Davies.

14 Q. What's your date of birth?

15 A. April 4th, 1968.

16 Q. How many times have you been deposed prior to
17 this deposition?

18 A. Zero. This is my first.

19 Q. Ms. Davies, the oath which you have just taken
20 is the same oath that you would take in a court of law.
21 The testimony that you give today has the same force and
22 effect as if you were testifying in court. The oath
23 requires that you tell the truth. And if you fail to do
24 so, you could be subject to penalties for perjury. You
25 must answer all of my questions honestly and directly.

1 **you?**

2 A. I received fluids right away and I already had
3 been taking Advil or Tylenol. I don't recall which.
4 I'm sure he administered more as the night went on.

5 **Q. Anything else he prescribed for you?**

6 A. No. That evening they did -- that evening and
7 subsequent evenings they did give me blood thinners,
8 injections in my abdomen because they were suspecting
9 COVID and just being preventative for blood clots. My
10 legs ached severely.

11 **Q. How long did you stay in the hospital?**

12 A. I stayed two nights, three days, and they
13 wanted to keep me a third night, and I begged them to
14 let me go home. I remember this.

15 **Q. Why did you want to go home?**

16 A. Because at that time they still thought they
17 were treating me for COVID, and I knew I could isolate
18 and be cared for at home, and I didn't like being in
19 that environment.

20 **Q. Did you feel better the second date you
21 were --**

22 A. No.

23 **Q. -- in the hospital?**

24 A. No. I got worse every day.

25 **Q. Could you describe your symptoms the second**

1 **day you were in the hospital?**

2 A. I maintained a very high fever between 101 and
3 103 the entire visit, even with medication. I was up
4 using the bathroom with diarrhea and vomiting every 30
5 to 60 minutes. I couldn't eat, I couldn't drink
6 anything without vomiting or having diarrhea right
7 after. I was in extreme pain from my body aches and
8 fever. I felt very, very sick, and nothing helped me
9 feel better.

10 Q. **Did the doctor prescribe any antibiotics for**
11 **you?**

12 A. They did not, not initially.

13 Q. **On the third date you were in the hospital,**
14 **did the symptoms get better?**

15 A. They did not. I developed blood in my stool
16 that day. My fever was still high, my heart rate was
17 still high, blood pressure low. Pretty much maintained
18 that the entire time.

19 It wasn't until they started measuring my
20 output of urine and diarrhea to make sure I was getting
21 enough fluid that -- they did test my stool, and that's
22 when it came back positive for Salmonella and
23 administered antibiotics.

24 Q. **What was your fever in the third day you were**
25 **in the hospital?**

1 A. It was 101.

2 Q. **It was lower than the day before?**

3 A. Slightly lower. It had ranged between 101 and
4 103 the whole time.

5 Q. **When did they give you a stool test?**

6 A. I don't know.

7 Q. **Were you given a stool test when you were in
8 the hospital?**

9 A. Yes.

10 Q. **When did the stool test result come back?**

11 A. It was late in the day on Sunday. The
12 afternoon on Sunday. So Day 2, correction, not Day 3,
13 Friday being Day 1.

14 Q. **Are you testifying that the result of the
15 stool test come back on the second day you were in the
16 hospital?**

17 A. Sunday. I went in on Friday; it came back on
18 Sunday afternoon.

19 Q. **Sunday in July 2020 is July the 12th.**

20 A. I don't recall the exact dates. I do recall
21 it was a Friday that I went to the hospital.

22 Q. **Friday in July 2020 -- that's the July
23 the 10th.**

24 A. Okay. I don't have the exact dates. I just
25 knew what day of the week it was.

1 **Q. Were you still in the hospital when the test**
2 **results came back?**

3 A. Yes, I was.

4 **Q. When were you released?**

5 A. I was released that evening, Sunday evening.

6 **Q. Do you know approximate time?**

7 A. I don't recall. They gave me antibiotics, and
8 I took oral antibiotics home, I remember, and I was able
9 to be released before dinner.

10 **Q. Did they prescribe antibiotics for you after**
11 **the test result?**

12 A. They did. I don't recall what they gave me.
13 I believe it was ciprofloxacin, but I can't be sure.

14 **Q. Who prescribed antibiotics for you at the**
15 **hospital?**

16 A. Who prescribed them? Is that what you asked?

17 **Q. Yes.**

18 A. Dr. Kimberly, infectious disease doctor at
19 Providence.

20 **Q. What's the last name?**

21 A. It's a male. And his name is Dr. Kimberly.

22 **Q. That's his -- Kimberly is his last name. And**
23 **what's his first name?**

24 A. I don't know.

25 **Q. Did you take antibiotics that evening?**

1 A. I did. I took them for seven days. I believe
2 seven days. I think they gave me a course for 14 and
3 said take for a minimum of seven. I don't recall how
4 long I took them. A minimum of seven.

5 **Q. Why did you stop taking antibiotics after
6 seven days?**

7 A. I did what the doctors told me to do. That's
8 why I quit.

9 **Q. Did your symptoms subside after you took
10 antibiotics?**

11 A. Not for a while, no. My fever did, my chills
12 did. My bowels did not return to normal for a long
13 period of time, but the symptoms surrounding the fever
14 did. I continued to vomit another week and feel
15 nauseous. I remember that.

16 **Q. When you say "another week," that means a week
17 following your release from the hospital?**

18 A. Yes.

19 **Q. Could you describe for me your diarrhea
20 symptoms after you took antibiotics?**

21 A. My diarrhea continued for months, at least
22 two months. Whenever I ate something, I would get
23 diarrhea. My stomach did not tolerate food for a long
24 time.

25 **Q. Was your diarrhea different from before you**

1 **took antibiotics?**

2 A. I don't remember what it was like. I don't
3 remember.

4 Q. **Isn't it true that all of your symptoms have**
5 **subsided a week after the release from the hospital**
6 **other than diarrhea?**

7 MS. LIEN: Objection. Foundation.

8 Go ahead, Lori.

9 THE WITNESS: I still believe I deal with
10 symptoms from that Salmonella event today -- with my
11 stomach.

12 BY MS. CHEN:

13 Q. **That's my question to you. Other than**
14 **diarrhea --**

15 A. No. No, they did not stop.

16 Q. **Let's talk about fever. When did your fever**
17 **stop?**

18 A. I don't recall the exact day. I would say
19 within that week my fever was more normal -- back to
20 normal. Maybe five days, four days.

21 Q. **You mean within the week you were released**
22 **from the hospital; is that correct?**

23 A. Yes. Yes.

24 Q. **What about your chills?**

25 A. Could you repeat that?

1 **Q. What about the chills?**

2 A. The chills? My body remained chilled off and
3 on for a while. I don't recall how long. And the aches
4 remained for a while, the body aches.

5 **Q. When you say "for a while," could you give me
6 an approximate time frame?**

7 A. I remember I went to see my doctor again
8 because I still wasn't feeling well towards the end of
9 July or the beginning of August. And at that time he
10 explained to me, in his opinion, the sepsis that I
11 suffered was going to be with me for a while, three to
12 four months, until my body felt better from the sepsis
13 Salmonella, as he called it. I was tired, my bowels
14 were not normal, I felt feverish off and on. I just
15 didn't feel well.

16 **Q. What's the name of the doctor who told you
17 that your sepsis would take a while to recover?**

18 A. Dr. Karl Kaluza.

19 **Q. Who diagnosed you with sepsis?**

20 A. The hospital.

21 **Q. Talking about the doctor. Who?**

22 A. I don't know. It was noted on my release
23 form, that I was treated for sepsis/Salmonella.

24 **Q. How did they treat you for sepsis at the
25 hospital?**

1 A. I don't know.

2 Q. **What medication did they provide for you for**
3 **sepsis?**

4 A. I don't recall.

5 Q. **While you were in the hospital, did a doctor**
6 **prescribe any procedures or surgeries on you?**

7 A. Just the COVID testing. It's my understanding
8 that they didn't realize it was Salmonella until Sunday,
9 and that's when they determined I was suffering with
10 sepsis from the Salmonella. They had treated me
11 primarily for COVID, so that's why they didn't know
12 until that stool sample came back. That's my
13 understanding.

14 Q. **You testified earlier that your vomiting**
15 **symptoms were resolved after a week you were released**
16 **from the hospital. Is that correct?**

17 A. Correct.

18 Q. **What about abdominal pain?**

19 A. I had nausea for that week after I came home.
20 I did have some cramping with some diarrhea and when I
21 ate for a period of time. I don't recall how long, but
22 I -- I do believe that's one of the things that brought
23 me back to Dr. Kaluza for a second visit: Discomfort,
24 abdominal discomfort.

25 Q. **Did your nausea symptoms resolve within a week**

1 **you were released from the hospital?**

2 A. The vomiting resolved. Nausea came and went
3 for a while.

4 Q. When you say "for a while," can you give me a
5 time frame?

6 A. I don't remember.

7 Q. Do you still have nausea in August 2020?

8 A. I don't remember that.

9 Q. Do you still have nausea September 2020?

10 A. I do not remember.

11 Q. Did your nausea symptoms resolve in 2020?

12 A. I do not remember.

13 Q. Did your nausea symptoms resolve in 2021?

14 A. In 2021 I went back to the doctor for
15 suspicion of SIBO, which I feel is a result of my
16 stomach-borne illness. And I was experiencing diarrhea,
17 nausea, bloating, and discomfort.

18 Q. Which doctor did you see in 2021 for SIBO?

19 A. I saw my doctor, Karl Kaluza, and I saw a
20 functional medicine practitioner.

21 Q. What's the name of the functional medical
22 practitioner?

23 A. Megan Barnett, B-A-R-N-E-T-T. Megan.

24 Q. Is Ms. Barnett a doctor?

25 A. She's not. She's a practitioner.

1 **fuller or thinner than the average woman your age.**

2 **Do you understand that?**

3 A. Sure.

4 Q. **Let's go back to my nausea questions.**

5 A. Okay.

6 Q. **Did your nausea symptoms resolve in 2022?**

7 A. I still today deal with nausea, so no.

8 Q. **Are you claiming you had to buy a wig for you
9 as a result of a Salmonella illness?**

10 A. Could you repeat that question?

11 Q. **Are you claiming you had to buy a wig for
12 yourself as a result of your Salmonella symptom?**

13 A. I did buy a hair topper when I was beginning
14 to lose hair, yes. I was losing hair in this front
15 section and on the side, so the top wasn't as full as I
16 like.

17 Q. **As far as I can tell from the Zoom screen,
18 your hair looks fuller than any of the other three women
19 on Zoom today.**

20 MS. LIEN: Object to the form of the question.
21 Argumentative.

22 And, frankly, a little offensive, Helen.

23 THE WITNESS: I know. Thank you for the
24 compliment.

25 ///

1 A. Dirty dishwater blonde is what they've always
2 called it.

3 **Q. What did you highlight with?**

4 A. What did I highlight with? I go to the salon,
5 and she uses a formula. I'm not aware of what it is.

6 **Q. What's the color of your highlight?**

7 A. It's a darker blonde.

8 **Q. Darker blonde in your natural hair?**

9 A. There is blonde in my natural hair, yes.

10 **Q. Describe to me your symptoms of diarrhea in
11 August of 2020.**

12 A. I still had loose stools when I ate for at
13 least the month of August and into September.

14 **Q. How many times a day do you have loose stools?**

15 A. I don't remember how many times. All the
16 time. I never had a normal bowel movement for at least
17 August and possibly September.

18 **Q. What were your bowel movements like in June?**

19 A. Very loose. They were very loose, and they
20 came more frequently than -- I was normal one day before
21 the Salmonella, one time a day. And I would say most of
22 the time I ate something I would have a loose stool
23 multiple times a day.

24 **Q. You had loose stools multiple times a day when
25 you ate in June 2020?**

1 A. No. I wasn't -- I got sick in July 2020.

2 Q. **No. What --**

3 A. This was in August and September 2020 --

4 Q. **What I was asking --**

5 A. -- is what I was referencing.

6 Q. **You need to listen to my question and do not**
7 **answer my question until I'm done with my question.**

8 **What I was asking you was what were your bowel**
9 **movements like in June 2020?**

10 A. One time a day, very normal.

11 Q. **You testified you had loose stool multiple**
12 **times a day. When was that?**

13 A. August, July 2020.

14 Q. **When you say "multiple times," how many times**
15 **in July?**

16 A. Every day when I would eat, I would have loose
17 stools shortly thereafter. My bowel movements were not
18 normal day-to-day at all. Always loose, I would say,
19 two to three times a day every day.

20 Q. **What about your bowel movements in**
21 **September 2020?**

22 A. I think they were probably improving by
23 mid-September, early September.

24 Q. **Could you describe your bowel movements after**
25 **September 2020?**

1 A. After September 2020, I struggled with some
2 diarrhea, some constipation, bloating when I would eat,
3 gassiness.

4 Q. When you say "some diarrhea," could you
5 describe in detail?

6 A. My stools remained loose for a period of time.
7 I don't remember how many times or for how long.

8 Q. You testified earlier it was better in
9 September than in June -- than July and August 2020. Is
10 that correct?

11 A. The diarrhea was better in September than July
12 and August, yes.

13 Q. Did you have less diarrhea a day after
14 mid-September 2020?

15 A. I don't remember. Probably.

16 Q. Did you ever constipate before July 2020?

17 A. Could you repeat that, please?

18 Q. Did you ever constipate before July 2020?

19 A. I'm sure on occasion, yes.

20 Q. Describe your constipation symptoms in
21 July 2020.

22 A. I did not have any constipation in July 2020.

23 Q. Did you have constipation symptoms in
24 August 2020?

25 A. No, I did not.

1 **Q. How about September 2020?**

2 A. I would say no.

3 **Q. How about the rest of the months in 2020?**

4 A. That's probably when that started happening:
5 October, November, December, and thereafter.

6 **Q. Could you describe for me your constipation**
7 **symptoms during these months?**

8 A. Bloating, cramping, pain, just the
9 irregularity of using the bathroom, feeling gassy, I
10 suppose, full.

11 **Q. How frequent was your constipation, bloating,**
12 **and gassy symptoms in a day during those months?**

13 A. Regularly. I regularly felt bloated and gassy
14 during those months --

15 **Q. Did you still --**

16 A. -- 2020.

17 **Q. Did you still have diarrhea symptoms in**
18 **those months?**

19 A. Not that I recall.

20 **Q. When did your diarrhea symptoms stop?**

21 A. I do not remember when they stopped.

22 **Q. But you just testified that you did not have**
23 **diarrhea symptoms from October to December 2020; is that**
24 **correct?**

25 A. I may have on occasion when I ate something,

1 but I do not remember that far back.

2 **Q. Did you have diarrhea symptoms in 2021?**

3 A. I'm sure I did on occasion, yes. Both
4 constipation and diarrhea and the bloating.

5 **Q. When you say "on occasion," could you describe**
6 **in detail what does that mean?**

7 A. There was no predictability to my bowel
8 movements, is, I guess, what I'm trying to explain.
9 Some days it would be okay, and the next day it would be
10 loose stool or constipation. I never had consistency.

11 **Q. Did you have breast implants after your breast**
12 **surgery?**

13 A. I did.

14 **Q. When did you have breast implants?**

15 A. When did I have them? I had a double
16 mastectomy in 2013, May. I was prophylactic. There's a
17 strong family history of breast cancer, and I had had
18 indicators of early stage, and I reconstructed in the
19 fall of 2013, maybe winter. I don't recall the month.

20 **Q. At any time after 4/20/14, did you have your**
21 **implants removed?**

22 A. Yes, I did.

23 **Q. When did you have your implants removed?**

24 A. I've had different sets of implants. Are you
25 asking about permanent removal or switched?

1 **Q. Did your mom lose hair after chemotherapy?**

2 A. She did.

3 MS. CHEN: I think we can have a break for
4 ten minutes. We'll be back at 11:57. Actually -- yeah,
5 11:57. How's that?

6 MS. LIEN: That's fine.

7 THE WITNESS: 20 minutes?

8 MS. LIEN: Do you want to do 20 or 10, Helen?

9 MS. CHEN: Actually, 10.

10 MS. LIEN: So 11:47?

11 MS. CHEN: 47. Yes. That's correct. Thank
12 you.

13 (Break taken from 11:37 a.m. to 11:47 a.m.)

14 BY MS. CHEN:

15 **Q. Ms. Davies, do you understand that you're**
16 **still under the oath?**

17 A. Yes.

18 **Q. Did you seek treatment from a rheumatologist?**

19 A. I was referred to a rheumatologist after being
20 released from the hospital because my ANA, which is my
21 inflammatory marker, had turned from negative to
22 positive, and my doctor wanted me to be seen by a
23 rheumatologist for care.

24 **Q. Who referred you to a rheumatologist?**

25 A. I went to Dr. Mollie Thompson.

1 **Q. I'm asking who referred you to --**

2 A. Dr. Karl Kaluza.

3 **Q. Did Dr. Kaluza refer you to any other doctors?**

4 A. Not at that time. He recommended the
5 rheumatologist.

6 **Q. Did you see Dr. Thompson?**

7 A. Yes.

8 **Q. When was the first time you saw Dr. Thompson?**

9 A. I do not remember the date.

10 **Q. Do you remember the year you saw Dr. Thompson?**

11 A. It was -- I don't remember the year, but I
12 would think it was in the same year as my Salmonella in
13 2020.

14 **Q. What's Dr. Thompson's diagnosis when you saw
15 him?**

16 A. She's a female, and I don't recall her giving
17 me a diagnosis. We talked about my inflammatory markers
18 and what that meant when an ANA moves from negative to
19 positive, but I don't recall the rest of the
20 conversation.

21 **Q. Did Dr. Thompson prescribe any medications for
22 you?**

23 A. I do not recall she did. I do not recall.

24 **Q. Did she prescribe any tests for you?**

25 A. I do not recall.

1 A. I have vascular insufficiency in my lower
2 legs.

3 Q. **Is Dr. Perez affiliated with Providence**
4 **Hospital?**

5 A. Yes, he is.

6 Q. **Did Dr. Perez tell you that your illness was**
7 **caused by Salmonella?**

8 A. No, he did not.

9 Q. **Who is Dr. Kursteen Price?**

10 A. She is an immunologist and allergist. I was
11 referred to her from Megan Barnett at the BioLounge.

12 Q. **What did you see Dr. Price for?**

13 A. I was told that my gut health was compromised
14 and that I may have what's termed mast cell activation,
15 which can be caused from an event, and I went to
16 Dr. Price for a consult.

17 Q. **Did Dr. Price give you any diagnosis?**

18 A. She treated me for mast cell activation with
19 two medications. I only recall one of them; I don't
20 remember the name of the other. One was ketotifen.

21 Q. **Did you take the medication?**

22 A. I did take that medication.

23 Q. **Did you take --**

24 A. Yes, I took -- I took both.

25 Q. **Did Dr. Price tell you that your illness was**

1 **caused by Salmonella?**

2 A. No, she did not. She did imply that sepsis
3 could have been a cause for a condition such as mast
4 cell activation.

5 **Q. Did you ever see Dr. Emma Ellsworth?**

6 A. Emma Ellsworth. Yes, I did.

7 **Q. What did you see her for?**

8 A. I saw her in an attempt to heal my body of
9 multiple issues I was experiencing after the Salmonella.
10 We tried acupuncture, and it didn't work for me because
11 I had an allergic reaction to the needles, a histamine
12 reaction from the treatment.

13 **Q. When did you see Dr. Emma Ellsworth?**

14 A. I do not recall when I saw her.

15 **Q. How many times did you see her?**

16 A. Approximately four to six times. I don't
17 remember exactly.

18 **Q. Did Dr. Ellsworth tell you that your symptoms
19 were caused by Salmonella?**

20 A. No, she didn't.

21 **Q. When was the last time you saw Dr. Ellsworth?**

22 A. 18 months ago, two years ago. 18 months. I
23 don't recall.

24 **Q. Who is Julie Decker?**

25 A. Julie Decker is a lymphatics provider. She's

1 not a doctor.

2 **Q. Is she massage therapist?**

3 A. She is more than a massage therapist. She
4 works with patients with lymphedema, lymphatic issues,
5 stagnancy. I was recommended to her by my primary care
6 physician.

7 **Q. Did Dr. Kaluza recommend you to Ms. Decker for
8 your Salmonella symptoms?**

9 A. I was having a lot of stagnancy in my
10 lymphatic system, specifically in my abdomen area, and I
11 went to her for six months, maybe nine months, to try to
12 get movement in my lymphatic system.

13 **Q. What did she do for you?**

14 A. She would do manual lymphatic drainage
15 techniques as well as radiofrequency drainage
16 techniques, pushing the lymphatic fluid.

17 **Q. When was the first time you saw Ms. Decker?**

18 A. I do not remember.

19 **Q. How many times did you see her?**

20 A. I think I saw her for a period of six to
21 nine months. I probably saw her 10 to 15 times
22 approximately.

23 **Q. When was the last time you saw her?**

24 A. Maybe a little over a year ago, a little more.

25 **Q. Did Ms. Decker ever tell you that your**

1 **did you go back to him again?**

2 A. I see him regularly as my primary care
3 physician.

4 **Q. I'm talking about did you see him again for**
5 **the Salmonella illness after July 2020?**

6 A. Yes. He tested me for SIBO, which I feel is
7 directly related to my Salmonella poisoning.

8 **Q. When did he test you for SIBO?**

9 A. I don't remember the month. It was the
10 following year most likely.

11 **Q. Could you spell --**

12 A. I do not remember the date.

13 **Q. Could you spell SIBO for me?**

14 A. S-I-B-O. It's short for small intestinal
15 bacterial overgrowth.

16 **Q. Did Dr. Kaluza tell that you your SIBO**
17 **symptoms were caused by Salmonella?**

18 A. Yes. He did imply that that was the cause of
19 it.

20 **Q. It's different from imply or state.**

21 **Did he state in certainty that your SIBO**
22 **symptoms were caused by Salmonella?**

23 MS. LIEN: Objection --

24 THE WITNESS: I do not recall if he said that.

25 ///

1 BY MS. CHEN:

2 Q. And then when you say he "implied," what do
3 you mean?

4 A. We talked at length about my Salmonella and
5 sepsis and what that can do to a body and the recovery
6 and that SIBO can be a direct relation to an illness
7 like that and that it is very hard to eliminate from the
8 body. That's what he has said to me. And it tends to
9 reoccur.

10 Q. How did he diagnose that you have SIBO?

11 A. I did a test that was a breath test, which was
12 sent to a laboratory.

13 Q. Did he prescribe any medications for you?

14 A. Yes, he did.

15 Q. What kind?

16 A. It's an antibiotic named Xifaxan,
17 X-I-F-A-X-A-N.

18 Q. Did you take the antibiotic?

19 A. Yes, I did.

20 Q. Did your SIBO symptoms resolve after you took
21 the antibiotic?

22 A. No, they have not.

23 Q. Do you still have SIBO symptoms?

24 A. Yes, I do.

25 Q. Are you still taking antibiotics?

1 was septic while in the hospital from Salmonella. And
2 when you become septic, your body has a systemic
3 reaction to the illness, and that's maybe why it's
4 taking me longer to recover and why other issues have
5 occurred. That's my understanding from talking to
6 physicians.

7 BY MS. CHEN:

8 **Q. As you sit here today, have your diarrhea
9 symptoms resolved?**

10 A. I have loose stools on occasion. I take
11 magnesium to help my bowels at this point on a daily
12 basis.

13 **Q. Who told you to take magnesium?**

14 A. I take magnesium every night. I take the
15 brand label Pure.

16 **Q. No. Who told you to take magnesium?**

17 A. I don't recall which doctor or doctors, but
18 they -- some or one suggested it may help --

19 **Q. Did it help?**

20 A. -- so I took it.

21 I still believe I have SIBO, so I don't know.

22 **Q. When you say you still have SIBO, can you
23 describe for me?**

24 A. Yes. I still have a lot of bloating and
25 discomfort in just the abdominal area. I'm gassy and

1 it's discomfort. And when I eat sometimes, I'm
2 constipated and sometimes I get diarrhea. There's not
3 consistency with my bowels.

4 **Q. As you sit here today, have your nausea**
5 **symptoms completory resolved?**

6 A. I'm not nauseous right now.

7 **Q. I'm asking you have your nausea symptoms**
8 **completely resolved, as you sit here today?**

9 A. I don't know if my nausea that comes and goes
10 is from SIBO, Salmonella, or what I ate. I occasionally
11 have nausea.

12 **Q. When you say "occasionally," how often is**
13 **that?**

14 A. Maybe a couple times a month, but my bloating
15 is every day. Any time I eat, I have a descended
16 abdomen and bloating.

17 **Q. As you sit here today, has the vomit symptom**
18 **resolved?**

19 A. Yes.

20 **Q. As you sit here today, has your chill symptoms**
21 **resolved?**

22 A. Yes.

23 **Q. Did you seek treatment caused by Salmonella**
24 **from Dr. Rosario Bonafede?**

25 A. I don't know the name of that doctor.

1 trouble with them, but it's the reason I remove them.

2 **Q. Are you seeking psychological care damages in**
3 **this lawsuit?**

4 A. No, I'm not.

5 **Q. Are you seeking emotional distress damages in**
6 **this lawsuit?**

7 A. I am not. Any of my counseling is unrelated
8 to this.

9 **Q. I just want to confirm that you're not seeking**
10 **emotional distress damages as a result of your**
11 **Salmonella illness. Is that correct?**

12 MS. LIEN: Objection. Foundation.

13 Go ahead, Lori.

14 THE WITNESS: Well, I feel like I have
15 emotional distress, and I would like to receive damages,
16 but I have not sought mental healthcare for this at this
17 time.

18 BY MS. CHEN:

19 **Q. Are you going to seek mental healthcare in the**
20 **future?**

21 MS. LIEN: Same objection.

22 THE WITNESS: I'm always open to mental
23 healthcare if I have the need. Yes, I will, if I need
24 it.

25 ///

1 indicators that I was at risk and went through genetic
2 counseling [verbatim] to determine that overall risk.

3 **Q. It will be a year from now until trial.**

4 **Could you tell me what your emotional distress**
5 **symptoms are?**

6 MS. LIEN: Object to the form.

7 THE WITNESS: I think about my overall health
8 every day and was a very healthy 52-year-old woman, very
9 active, very athletic, very strong, very fit. And since
10 that time I feel that my gut health is extremely
11 compromised. I'm just trying to find ways to feel
12 better. I've bought too many supplements to count,
13 trying to have a healthy gut microbiome.

14 BY MS. CHEN:

15 **Q. Can you specify what you have bought?**

16 A. Probiotics. Different probiotics.

17 **Q. Could you be more specific?**

18 A. You want to know the name of the probiotic?

19 **Q. Yes.**

20 A. I don't know how to pronounce it, so I will
21 spell it. L-A-C-T-O-B-A-C-I-L-L-U-S, Gasseri,
22 G-A-S-S-E-R-I, is the one I currently use.

23 **Q. Did your doctors ever prescribe those**
24 **probiotics for you?**

25 A. No.

1 **Q.** **You just did it on your own?**

2 **A.** Yes.

3 **Q.** **As you sit here today, have your emotional**
4 **distress symptoms resolved?**

5 **A.** I would say no.

6 **Q.** **Could you be more specific?**

7 **A.** As I just said, I think about it every day and
8 don't feel like the 52-year-old healthy woman I was
9 before this, and new things that occur in my health I
10 feel and believe are related to the inflammatory issues
11 that developed as a result of that issue and that
12 illness.

13 **Q.** **Who is Margo Passadore?**

14 **A.** That's my sister-in-law.

15 **Q.** **You listed her as a witness to your --**

16 **A.** Yes.

17 **Q.** **-- lawsuit?**

18 **A.** Yes.

19 **Q.** **What is she going to testify at trial?**

20 **A.** That she has seen me sick and struggling to
21 get better for years.

22 **Q.** **Who is Christie Post?**

23 **A.** She's a friend.

24 **Q.** **You listed her as a witness?**

25 **A.** Yes.